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LETTER AND RESPONSE TO FOLLOW-UP COMMENTS ON DRAFT FEASIBILITY STUDY
FOR GROUNDWATER SITE 3 NWS YORKTOWN VA

1/10/2013
CH2M HILL



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January 10, 2014

Mr. Moshood Oduwole
Federal Facility Remediation (3HS11)
USEPA Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Subject: Response to Follow-Up Comments on the *Draft Feasibility Study for Groundwater at Site 3, NWS Yorktown, Yorktown, Virginia*

Dear Mr. Oduwole,

This letter is in response to comments on the September 10, 2013 RTC letter for the subject document. The USEPA provided one follow-up comment in an email dated November 8, 2013. Numerous discussions regarding this comment were held by the Navy and USEPA in November and December 2013 in order to obtain a resolution. The initial September 2013 comment and the November 2013 follow-up comment are shown below, followed by the Navy responses in italics.

USEPA TECHNICAL SUPPORT COMMENTS

Biological Technical Support Group (BTAG)

Comment #3: The development of a third remedial action objective (RAO) is needed (Section 3.2). This new RAO needs to ensure the protection of human health and the environment. It is possible for the currently stated ROs to be met, yet implementation of the remedy could result in an unacceptable risk to ecological receptors.

Response: *A third RAO will not be added since there were no unacceptable risks identified in surface water. However, the alternative descriptions in Section 4 of the FS report will be modified to incorporate monitoring to assess future potential risks from groundwater discharge to surface water. See response to BTAG comment #1 for details.*

Follow-Up Comment: BTAG Comment 3 recommended that a third remedial action objective (RAO) be added to Section 3.2 to ensure protection of ecological receptors from a discharge of contaminated groundwater. The response states that an RAO will not be added since there was no unacceptable risk identified in surface water and monitoring will be used to assess the potential for future risk. Because concentrations in groundwater exceed BTAG screening levels for surface water for several chemicals, a remedial action objective is needed to ensure that these groundwater contaminants do not discharge to surface water in the future at concentrations that could present potential ecological risk, particularly at the groundwater/surface water interface where receptors would be exposed to relatively undiluted

Mr. Moshood Oduwole

November 19, 2013

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groundwater concentrations. It should be noted that the ecological receptors of concern are those in both sediment and/or surface water. The addition of an RAO will ensure this issue is considered in the future monitoring.

Response: *The inclusion of an additional RAO and potential language for that RAO was discussed during the December 11, 2013 Yorktown Partnering Meeting. After further discussion between the Navy and the USEPA, the Navy agreed in an email dated December 18, 2013 to include the following RAO, "Prevent unacceptable risk to ecological receptors from exposure to COCs in groundwater that discharges to Indian Field Creek." The Site 3 FS Report will be updated accordingly.*

Please provide acceptance of this response. Should you have any additional questions, please feel free to contact me.

Sincerely,

CH2M HILL

William J. Friedmann, Jr.

Activity Manager

cc: Mr. Moshood Oduwole /USEPA
Mr. James Gravette/NAVFAC Midlant
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